

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 05-495-JJF
)	Judge Joseph J. Farnan Jr.
LAWNS UNLIMITED, LTD. and)	
EDWARD FLEMING,)	
)	
Defendants,)	

**PLAINTIFF'S RESPONSE TO DEFENDANTS'
REQUEST FOR DETAIL DAMAGES LIST**

Pursuant to Defendants' request under Rule 26 of the Federal Rules of Civil Procedure, Plaintiff is providing the detailed list of damages. Supporting documentation was previously submitted to the Court and Defendants.

Detailed lists include:

Summary of Expenses

Medical Expenses

2003 Lost Wages

2004 Lost Wages

2005 Lost Wages

2006 Lost Wages

Miscellaneous Expenses

Sincerely,

A handwritten signature in black ink, appearing to read "Renée M. Butz", written over a horizontal line.

Renée M. Butz
58 Hickory Drive
North East, MD 21901
(410) 441-4300

Plaintiff pro se

**Summary of Expenses/Losses
As of September 01, 2006**

Medical Costs

Medical bills incurred to date	15,045.69
Medical premiums paid to date	2,364.94
	<hr/>
	17,410.63

2004 24wks @ 32.44 = 778.56
2005 26wks @ 35.69 = 927.94
2006 18wks @ 36.58 = 658.44

2003 Wages	2,360.00
2004 Wages	29,320.00
2005 Wages	30,984.50
2006 Wages	32,327.95
Miscellaneous Costs	460.91

TOTAL

112,863.99

<u>Date</u>	<u>Vendor</u>	<u>Description</u>	<u>Total Amount</u>	<u>For Who</u>	
<u>MEDICAL BILLS WITHOUT INSURANCE (OR WITH LAWNS UNLIMITED INSURANCE)</u>					
12/25/03	Christiana Care Health Services	Labor pains	223.50	Renée	12/25/03-12/26/03
12/30/03	Bayside Health OBGYN	C-Section	3,500.00	Renée	
12/30/03	Beebe Medical Center	Hospital Expenses	6,464.95	Renée	12/30/03-1/1/04
12/30/03	Beebe Medical Center	Hospital Expenses	1,723.56	Renée	12/30/03-1/1/04
12/30/03	TMS	Hospital Expenses	10.30	Renée	12/30/03-1/1/04
01/02/04	William B Funk MD	Well Visit	60.00	Corrine	
01/04/04	Christiana Care Health Services	Lab	11.50	Corrine	
01/04/04	Christiana Care VNA	Nurse Visit	363.00	Corrine	1/4/04-1/06/04
01/05/04	Christiana Care VNA	Nurse Visit	150.00	Corrine	
01/06/04	Christiana Care VNA	Nurse Visit	150.00	Corrine	
01/08/04	William B Funk MD	Well Visit	60.00	Corrine	
01/12/04	William B Funk MD	Well Visit	110.00	Corrine	
01/12/04	William B Funk MD	Back pain, cough, fever	110.00	Renée	
02/01/04	Happy Harrys	Birth Control	30.75	Renée	
			12,967.56		
<u>MEDICAL BILLS WITH INSURANCE</u>					
04/12/04	William B Funk MD	Breast feeding problems	60.00	Renée	
04/12/04	William B Funk MD	Breast feeding problems	60.00	Renée	
04/22/04	William B Funk MD	Breast feeding problems	60.00	Renée	
05/05/04	LabCorp	Bloodwork	46.00	Renée	
05/05/04	William B Funk MD	Strep Test	25.00	Renée	
05/05/04	William B Funk MD	Office Visit	100.00	Renée	
05/25/04	William B Funk MD	Cough	60.00	Renée	
06/28/04	Union Hospital	Bloodwork	45.75	Renée	
06/29/04	Vision Associates	Eye Exam	273.00	Renée	
08/02/04	Eckerd	Birth Control	43.69	Renée	
08/30/04	Eckerd	Birth Control	43.69	Renée	
10/06/04	Fred L Wright, Jr., D.D.S.	Dentist Visit	158.00	Renée	
04/06/05	Womens Health Associates	OBGYN	140.00	Renée	
04/07/05	LabCorp	Bloodwork	92.00	Renée	
05/09/05	William B Funk MD	Numbness	60.00	Renée	
05/11/05	Fred L Wright, Jr., D.D.S.	Dentist Visit	115.00	Renée	
12/19/05	Fred L Wright, Jr., D.D.S.	Dentist Visit	117.00	Renée	
12/23/05	William B Funk MD	Dizziness	60.00	Renée	
02/23/06	McDermott Chiropractic Centre	Chiropractic Visit	167.00	Renée	
02/25/06	McDermott Chiropractic Centre	Chiropractic Visit	167.00	Renée	
04/24/06	William B Funk MD	Follow Up	65.00	Renée	
07/12/06	Fred L Wright, Jr., D.D.S.	Dentist Visit	120.00	Renée	
			2,078.13		
GRAND TOTAL			15,045.69		

2003 Wages			
Description	Calculation	Amount	Notes
Wages	\$1008 - \$726	282.00	Difference of Unemployment to Regular Earnings
Overtime Wages	10 hours x \$18	180.00	Unpaid overtime hours actually worked
Wage Increase	16 weeks x 40 hours x \$.75	480.00	Anticipated wage increase to have begun on employment anniversary date
Vacation	40 hours x \$12.75	510.00	2003 Unpaid Vacation Days (5 Accrued Days)
Personal	16 hours x \$12.75	204.00	2003 Personal Days (2 Accrued Days)
Christmas	8 hours x \$12.75	102.00	Unpaid Holiday pay
New Year's	8 hours x \$12.75	102.00	Unpaid Holiday pay
Bonus	Estimated	500.00	Anticipated 2003 Bonus (2002 Bonus was \$500)
TOTAL		2,360.00	

2004 Wages			
Description	Calculation	Amount	Notes
Wages	52 weeks x 40 hours x \$12.75	26,520.00	Includes paid Holidays
Overtime Wages	50 hours x \$19.12	956.00	Anticipated unpaid overtime work hours
Wage Increase	16 weeks x 40 hours x \$.75	480.00	Anticipated wage increase to have begun on employment anniversary date
Vacation	40 hours x \$13.50	540.00	2004 Unpaid 5 Accrued Vacation Days
Personal	24 hours x \$13.50	324.00	2004 3 Unpaid Accrued Personal Days
Bonus	Estimated	500.00	2004 Bonus (2002 Bonus was \$500)
TOTAL		29,320.00	

2005 Wages

Calculation	Amount	Notes
52 weeks x 40 hours x \$13.50	28,080.00	Includes paid Holidays
50 hours x \$20.25	1,012.50	Anticipated unpaid overtime work hours
16 weeks x 40 hours x \$.75	480.00	Anticipated wage increase to have begun on employment anniversary date
40 hours x \$14.25	570.00	2005 Unpaid 5 Accrued Vacation Days
24 hours x \$14.25	342.00	2005 3 Unpaid Accrued Personal Days
Estimated	<u>500.00</u>	2005 Bonus (2002 Bonus was \$500)
TOTAL	30,984.50	

2006 Wages			
Description	Calculation	Amount	Notes
Wages	52 weeks x 40 hours x \$14.25	29,640.00	Includes paid Holidays
Overtime Wages	35 hours x \$21.37	747.95	Anticipated unpaid overtime work hours
Wage Increase	16 weeks x 40 hours x \$.75	480.00	Anticipated wage increase to have begun on employment anniversary date
Vacation	40 hours x \$15.00	600.00	2006 Unpaid 5 Accrued Vacation Days
Personal	24 hours x \$15.00	360.00	2006 3 Unpaid Accrued Personal Days
Bonus	Estimated	500.00	2006 Bonus (2002 Bonus was \$500)
TOTAL		32,327.95	

Misc.				
Date	Vendor	Description	Amount	For Who
12/22/03	Happy Harry's	Staples	1.99	Lawns Unlimited supplies
07/15/05	U.S. District Court	Copy Fees	20.00	copy fees
01/27/06	U.S. District Court	Civil Files	250.00	file fee
03/22/06	Parcels	Court summons	100.00	hand delivery to L.U. & Eric Howard
03/22/06	USPS	Postage	3.03	mail to Parcels
04/06/06	USPS	Postage	5.12	mail to Eric Howard
04/11/06	USPS	Postage	5.12	mail to Eric Howard
05/11/06	USPS	Postage	14.40	mail to U.S. District Court
	Renee	Misc. fees	61.25	copying, filing, postage, supplies
		TOTAL	460.91	

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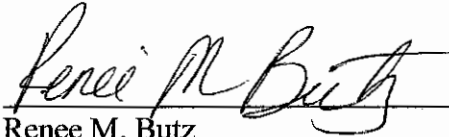
Defendants.

Civ. No. 05-495-JJF
Judge Joseph J.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Response To Defendants' Request For Detail Damages List were sent by first-class United States mail, postage duly paid, on this 30 day of March, 2007, to counsel of record as follows:

Margaret M. DiBianca
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building, 17th Floor
100 West Street
Wilmington, DE 19801



Renee M. Butz
58 Hickory Drive
North East, MD 21901
(410) 441-4300
Plaintiff pro se

Dated: 3/30/07